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December 30, 2024

VIA ECF

The Honorable Dale E. Ho
United States District Judge
United States District Court
for the Southern District of New York
Thurgood Marshall United States Courthouse
Courtroom 905
40 Foley Square
New York, NY 10007

Re: Girls Who Invest, Inc. v. Girls That Invest Limited, Case No. 1:24-cv-5094

Dear Judge Ho:

This firm represents plaintiff Girls Who Invest, Inc., and we write jointly with counsel for defendant Girls That Invest Limited, pursuant to Rule 2.a of Your Honor's Individual Rules and Practices in Civil Cases, to request a stay of this action for thirty (30) days to enable the parties to complete a settlement agreement. Given (i) the parties' recent significant progress in settlement discussions, (ii) their mutual desire to complete a settlement promptly and efficiently, and (iii) the multiple imminent discovery deadlines under the current case schedule, the parties respectfully submit that the parties' resources are best now allocated to finalizing a settlement agreement within 30 days under a stay of the action.

This Court regularly grants limited stays of proceedings to enable the parties to complete good faith settlement discussions. *See, e.g., Mattsson v. Pat McGrath Cosms. LLC*, No. 21CIV5187JSRSLC, Dkt. 140 (S.D.N.Y. Mar. 30, 2022) (granting joint motion for stay of proceedings for 45 days pending settlement discussions). As the parties believe in good faith that they are close to finalizing settlement terms, a stay of proceedings under the current circumstances would promote judicial efficiency in this action and appropriately marshal judicial resources of the Court. Conversely, engaging in extensive and contentious discovery and related motion practice would be counterproductive to the ongoing settlement negotiations and will significantly undermine the ability of the parties to efficiently resolve the limited remaining issues.



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In connection with the same, the parties propose that, by or before January 30, the parties will submit a joint status report to the Court regarding settlement status and, if necessary, any proposal for modification of case deadlines.

The parties have not previously made any request for a stay of this action.

Accordingly, the parties respectfully seek a stay of all proceedings for a period of thirty (30) days, and thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Tyler E. Baker

Tyler E. Baker
for SHEPPARD, MULLIN, RICHTER
& HAMPTON LLP

cc: Counsel of Record (via ECF)

The parties shall file a joint status letter describing whether their settlement efforts have been successful **by January 30, 2025.**

SO ORDERED.

Date: January 6, 2025

A handwritten signature in black ink, appearing to read "Dale Ho", written over a horizontal line.

Hon. Dale E. Ho
United States District Judge
New York, New York